

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 3, 2016

Jimmie Cho, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

GI-2015-05- SCG65-02A

Subject: General Order (G.O.) 112¹ Operation and Maintenance Inspection of Southern California Gas Company's Cathodic Protection Facilities in the San Joaquin Valley Distribution System

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112¹ Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Cathodic Protection (CP) Facilities in the San Joaquin Valley (Inspection Unit) on May 11-15, 2015. The inspection included a review of the Inspection Unit's cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in Bakersfield and Visalia districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violation of G.O. 112¹, Reference Title 49 Code of Federal Regulations (CFR), Part 192. However, SED noted a concern as described in the "Summary of Inspection Findings", which is enclosed with this letter.

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation discussed during the inspection. SED will notify SCG of the enforcement action it plans to take after it reviews SCG's inspection response. If you have any questions, please contact Durga Shrestha, at (213) 576-5763.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Durga Shrestha, SED/GSRB
Kan Wai Tong, SED/GSRB

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

Jeff Koskie, Sempra

**Summary of Inspection Findings
2015 SCG San Joaquin Valley Inspection
May 11 - 15, 2015**

I. Concerns, Recommendations, and Observations Summary

1. §192.463 (a) External corrosion control: Cathodic protection.

“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in [Appendix D](#) of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”

During field inspection of CP facilities, SED observed that the pipe-to-soil reads at the following locations as shown in the table were out of tolerance (low P/S reads) from its -0.850 volts criteria:

Area	Point	District	Read, V	Lower Limit, V
DIN 024	A	Visalia	-0.804	-0.850
OGCV 005	H	Visalia	-0.617	-0.670
VIS010	O	Visalia	-0.274	-0.541
PIX004	E	Visalia	-0.461	-0.474
PIX004	F	Visalia	-0.261	-0.422
CORC012	E	Visalia	-0.775	-0.850
ARM001	I	Visalia	-0.426	-0.500
DLN035	P	Bakersfield	-0.720	-0.850
DLN049	J	Bakersfield	-0.508	-0.576
DLN004	A	Bakersfield	-0.497	-0.850

SCG must implement a prompt corrective action to address the CP areas that are currently out of tolerance.